

SLR:LDM:BDM
F. #2020R00623

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

– – – – – X

UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

Criminal Docket No. 20-306 (NGG)

CHRISTOPHER CHIERCHIO *et al.*,

Defendants.

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The United States of America, by and through SETH D. DUCHARME, Acting United States Attorney for the Eastern District of New York, and Brian D. Morris, Lindsay K. Gerdes, and Andrey Spektor, Assistant United States Attorneys, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1) and 982(b)(1), Title 21, United States Code Section 853(p), and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that, in addition to the property described in the forfeiture allegations in the above-captioned Indictment, the United States seeks forfeiture of all right, title and interest in the property listed in Exhibit A hereto, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1) and 982(b)(1), Title 21, United States Code, Section

853(p), and Title 28, United States Code, Section 2461(c). The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
October 5, 2020

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
Brian D. Morris
Lindsay K. Gerdes
Andrey Spektor
Assistant United States Attorneys
(718) 254-6512/6155/6475

Exhibit A

Approximately one hundred twenty-seven thousand six hundred sixty dollars and seventy-five cents (\$127,660.75) seized from J.P. Morgan Chase account no. 201858559 held in the name of GK3 LLC on or about August 20, 2020, and all proceeds traceable thereto;

Approximately sixty-two thousand one hundred sixty dollars and twenty-eight cents (\$62,160.28) seized from J.P. Morgan Chase account no. 206002576465 held in the name of Jason M. Kurland and Lauren Kurland on or about August 20, 2020, and all proceeds traceable thereto;

Approximately two million eight hundred five thousand two hundred sixty-four dollars and thirteen cents (\$2,805,264.13) seized from SB One Bank account no. 94022189 held in the name of Chrch Group LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately thirty-three thousand eight hundred twenty-three dollars and thirty-nine cents (\$33,823.39) seized from Signature Bank account no. 1503564854 held in the name of Azimut 43 LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately three thousand one dollars and thirty-five cents (\$3,001.35) seized from Signature Bank account no. 1503564749 held in the name of Unified Commerical Painters of NY LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately four million seven hundred seventy-nine thousand nine hundred sixty-four dollars and sixty-five cents (\$4,779,964.65) seized from Signature Bank account no. 1503871374 held in the name of Chrch Group LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately five thousand one hundred seventy-one dollars and sixty-five cents (\$5,171.65) seized from Signature Bank account no. 1503564773 held in the name of Sirensusa G LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately one hundred sixty-nine thousand five hundred ninety-one dollars and six cents (\$169,591.06) seized from Signature Bank account no. 1503699083 held in the name of Meeker World Management Inc. on or about August 18, 2020, and all proceeds traceable thereto;

Approximately forty-seven thousand seven hundred thirty-six dollars and ninety-eight cents (\$47,736.98) seized from Signature Bank account no. 1503564714 held in the name of JBMML LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately one thousand two hundred seventeen dollars and thirty-two cents (\$1,217.32) seized from Signature Bank account no. 1503857592 held in the name of Southbound Relief Company LLC on or about August 18, 2020, and all proceeds traceable thereto;

Approximately six thousand seven hundred fifty-two dollars and fifty-five cents (\$6,752.55) seized from Sterling National Bank account no. 6700762804 held in the name of Gold Standard Depository Company on or about August 18, 2020, and all proceeds traceable thereto;

The real property and premises located at 20 Peppermill Lane, Dix Hills, New York 11746, and all proceeds traceable thereto.

Approximately fourteen thousand nine hundred twenty dollars and seventeen cents (\$14,920.17) seized from Sterling National Bank account no. 6700762839 held in the name of Francis L. Smookler on or about August 18, 2020, and all proceeds traceable thereto;

Approximately two million ninety-four thousand eight hundred forty-eight dollars and fifty-six cents (\$2,094,848.56) seized from TD Bank account no. 4333159469 held in the name of Taryn J Levi and Yanieve Levi on or about August 18, 2020, and all proceeds traceable thereto;

One (1) Boston Whaler 380 Outrage Motorboat Bearing Hull Identification Number BWCE1528A818, seized on or about August 18, 2020 from, Island Marine, Puerto Del Rey Marina, Fajardo, Puerto Rico and all proceeds traceable thereto;

One (1) Boston Whaler 350 Outrage Motorboat Bearing Hull, Identification Number BWCE2565E818, seized on or about August 26, 2020 from Safe Harbor Marina, Shore Road, Glen Cove, New York, and all proceeds traceable thereto;

Approximately two hundred forty-seven thousand eight hundred fifty-nine dollars and zero cents (\$247,859.00) seized from the partner capital account of Jason Kurland at the law firm Rivkin Radler LLP on or about October 2, 2020, and all proceeds traceable thereto; and